

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

RABBI MARA NATHAN, on behalf of herself and on  
behalf of her minor child, M.N., et al.,

Plaintiffs,

v.

ALAMO HEIGHTS INDEPENDENT SCHOOL  
DISTRICT, et al.,

Defendants.

CIVIL ACTION NO. 5:25-cv-00756

**DECLARATION OF ALLISON FITZPATRICK IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Allison Fitzpatrick, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a plaintiff in the above-captioned matter. I am suing on behalf of myself and on behalf of my minor children, C.F. and H.F.<sup>1</sup> Our family lives in Cypress, Texas.

2. C.F. and H.F. are enrolled in and will attend a public middle school in the Cypress Fairbanks Independent School District during the 2025-2026 school year. The first day of school this upcoming academic school year is scheduled for August 13, 2025.

3. My husband is an atheist, and I am spiritual but do not identify with or support any organized religion. We do not want C.F. and H.F. exposed to any organized religion, and we are raising them in a household and tradition in which we seek to provide them with the space and

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<sup>1</sup> In accordance with Federal Rule of Civil Procedure 5.2(a)(3), all minor Plaintiffs are identified by their initials.

autonomy to develop their own beliefs and views about religion. We discuss religion generally, but we do not observe or adhere to any religious text, practice, or ritual.

4. I understand that Senate Bill No. 10 (“S.B. 10”) requires displays of the Ten Commandments to be hung in a “conspicuous place” in every classroom at C.F.’s and H.F.’s school. The posters or framed copies of the Ten Commandments must be a minimum size of sixteen by twenty inches and printed in a size and typeface that is legible to a person with average vision from anywhere in the classroom. The poster or framed copy must include only the text of the Ten Commandments as set forth in S.B. 10. As a result of these minimum requirements, C.F. and H.F. will not be able to avoid the displays and will be subjected to them for nearly every hour of the school day.

5. My family does not subscribe to the religious dictates of the Ten Commandments generally or the specific version that S.B. 10 mandates. On behalf of myself and my children, therefore, I object to the displays mandated by S.B. 10 they will promote, and forcibly subject my children to, religious scripture that I do not believe in and do not teach my children.

6. The displays required by S.B. 10 will substantially interfere with C.F.’s and J.F.’s development when it comes to religious questions and matters and will threaten to undermine the beliefs, values, and practices pertaining to religious matters that my husband and I seek to instill in them as part of our nonreligious household. Specifically, the displays will impose on C.F. and H.F. one set of religious values and beliefs over our family’s values, which are not based in religion. I do not want the government to push any particular religion or religious morality on C.F. and H.F.

7. By imposing on C.F. and H.F. a particular Christian version of the Ten Commandments for nearly every hour of the school day, the displays required by S.B. 10 will also send a confusing message to them that the Commandments are rules that they must follow and that

and that those who do not do so are “bad” and less worthy, leading to peer-on-peer harassment and proselytization of my children because they are nonreligious.

8. As a result, the displays will not only increase the pressure on my children to suppress expression of their nonreligious background and views at school, but they will also pressure C.F. and H.F. to observe, meditate on, venerate, and adopt the State’s preferred religious doctrine, even though they may also recognize that the posted scripture does not comport with what they have been taught at home.

9. I believe that the Ten Commandments displays required by S.B. 10 will also create a structure for teachers and school administrators to inject other religious beliefs into the classroom. I do not want C.F. and H.F. to be subjected to religious indoctrination from teachers or school administrators.

10. For all the reasons noted above, the displays will directly interfere with and substantially burden my ability to direct my children’s education pertaining to religious questions and matters in a manner that emphasizes and instills nonreligious values.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 2, 2025.

  
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Allison Fitzpatrick